

ORIGINAL

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

BROADWATER ENERGY LLC)	DOCKET NO. CP06-54-000
)	
BROADWATER PIPELINE LLC)	DOCKET NO. CP06-55-000
)	DOCKET NO. CP06-56-000

**MOTION OF SHELL NA LNG LLC TO INTERVENE
AND COMMENTS IN SUPPORT OF APPLICATIONS**

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Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, Shell NA LNG LLC ("Shell LNG") moves to intervene and submits its comments in support of the applications of Broadwater Energy LLC and Broadwater Pipeline LLC (collectively, "Broadwater") filed in these proceedings on January 30, 2006. In support hereof, Shell LNG respectfully states as follows.

**I.
COMMUNICATIONS AND CORRESPONDENCE**

Communications and correspondence regarding these proceedings should be directed to the following representatives of Shell LNG:

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II. IDENTITY AND INTEREST OF SHELL LNG

Shell LNG is a Delaware Limited Liability Company engaged in the business of the importation of liquefied natural gas ("LNG") into the United States. Shell LNG is an affiliate of Shell Oil Company. Shell Oil Company and its affiliates are involved in both the domestic and international LNG business. Shell LNG is to be the capacity holder at the proposed Broadwater LNG terminal in Long Island Sound, New York.

III. THE BROADWATER FILINGS

On January 30, 2006, Broadwater Energy LLC filed an application under Section 3 of the Natural Gas Act and Part 153 of the Commission's regulations seeking authorization to site, construct and operate an offshore LNG receiving terminal and associated facilities in Long Island Sound, approximately nine miles from the Long Island shore in New York State waters. The terminal is to be a floating LNG receiving, storage, and regasification unit, designed to store the equivalent of 8 Bcf of regasified LNG and to provide an average throughput of 1 Bcf/d and peak throughput of 1.25 Bcf/d. Broadwater's proposed LNG terminal will facilitate the importation of LNG from foreign nations into the U.S.

Also on January 30, 2006, Broadwater Pipeline LLC filed an application requesting (i) a certificate of public convenience and necessity authorizing it to construct, own, operate and maintain a 30-inch, 22-mile subsea lateral (and related facilities), and (ii) a blanket certificate to perform routine activities in connection with the future construction, operation and maintenance of the 22-mile pipeline. Broadwater Pipeline also seeks authorization to permit its 22-mile pipeline to be used only for the purpose of transporting regasified LNG approximately 22 miles from the Broadwater Energy LNG terminal to a subsea interconnection with Iroquois Gas Transmission System, L.P. ("Iroquois").

The Broadwater entities have asked the Commission to issue final orders approving their applications by March 31, 2007, to enable them to commence construction in order to meet an in-service date of December 1, 2010.

IV. STATEMENT OF ISSUES

1. Whether the intervention of Shell LNG should be granted. Yes. *See* Rule 214 of the Commission's Rules of Practice and Procedure; Applications of the Broadwater entities.
2. Whether the Commission should approve the applications of the Broadwater entities in these proceedings. Yes. *See* Part VI below.

V. INTERVENTION

As the capacity holder in the Broadwater LNG terminal, Shell LNG has immediate, direct and substantial legal and economic interests in these proceedings. These interests cannot be adequately represented by any other party. The intervention of Shell LNG in this proceeding is therefore in the public interest.

VI. COMMENTS IN SUPPORT

Shell LNG's parent company and its affiliates are major participants in the worldwide LNG business. They are involved significantly in the development and transportation of global LNG supplies. Shell LNG holds capacity at the Cove Point and Elba Island LNG terminals. It is thus already involved in importing LNG into the United States and increasing gas supplies for U.S. consumers.

The proposed Broadwater facilities will be beneficial to both Shell LNG and potential consumers in the Northeastern United States. These facilities are close to growing markets, and

Shell LNG's imports to the Broadwater LNG terminal will increase and diversify the natural gas supply available in the Northeast.

On February 20, 2006, President Bush delivered timely remarks emphasizing the increasing importance of imported LNG to our nation's energy portfolio and security. At the Johnson Controls Building Efficiency Business in Milwaukee, Wisconsin, the President described several steps the United States needs to take to diversify and supplement its energy supplies. The President stated:

First, we've got to make sure that we've got enough natural gas to meet our home heating and industrial needs. And one of the best ways to secure supply is to expand our ability to receive liquefied natural gas.

* * * * *

The problem is, is that we didn't have enough sites to set up terminals to receive the LNG. And until there's a place for the LNG to unload, the liquefied natural gas, what I'm talking about isn't going to come to fruition. And so one of the things in the energy bill that was important is it clarified federal authority to site new receiving terminals for LNG. And that's good. In other words, if we need more natural gas to make sure that we take the pressure off the heating bills, as well as meet our industrial needs, we've got to have places for the liquefied natural gas to come into the country.

Remarks by the President on Energy, Milwaukee, Wisconsin, February 20, 2006.

Further to the President's recent remarks, Shell LNG believes that granting the applications of the Broadwater entities in these proceedings will strengthen and expand the natural gas supply for U.S. markets and be in the public interest.

WHEREFORE, Shell LNG requests that it be permitted to intervene in this proceeding with full rights as a party. Shell LNG supports the applications filed in these proceedings and urges the Commission to grant the authorizations requested by the Broadwater entities on a timely basis, without condition or modification.

Respectfully submitted,

By: /s/ R.J. Pautsch
R.J. Pautsch

Attorney for
SHELL NA LNG LLC

March 8, 2006

CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day served a copy of the foregoing on all persons designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 8th day of March 2006.

/s/ Charles H. Shoneman
Charles H. Shoneman

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